

**Federal Defenders  
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September 18, 2020

**BY ECF**

Honorable Valerie E. Caproni  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

USDC SDNY  
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**Re: United States v. Mack Duodu,  
20 Cr. 482 (VEC)**

**MEMO ENDORSED**

Dear Judge Caproni:

I write concerning Mr. Duodu's bail conditions.

First, at Tuesday's conference, the Court orally modified Mr. Duodu's bond, with the government's consent, to allow the remaining two cosigners to be moral-suasion cosigners rather than financially responsible persons. I understand that the Clerk's Office needs a written directive from the Court to effect this change to the bond before those individuals can sign. I therefore ask the Court to confirm this modification by endorsing this letter.

Second, following the discussion on the record concerning Mr. Duodu's proposed work, I was able to obtain more information about the renovation work opportunity and the parties engaged in fruitful discussions. I now ask the Court to modify Mr. Duodu's home-incarceration condition to permit him to perform construction and renovation-type work in the Southern or Eastern Districts of New York with the following additional conditions: (1) that the work occur during regular business hours (though Mr. Duodu may travel to and from work outside of those hours, as approved by Pretrial Services) and (2) that interior work occur only in vacant apartments or houses, *i.e.*, spaces empty of occupant belongings. So limited, the government has no objection to this proposed modification. Pretrial Services also has no objection to the proposed modification.

Respectfully submitted,  
/s/ Clay H. Kaminsky  
Clay H. Kaminsky  
Assistant Federal Defender  
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cc: AUSA Jonathan Rebold

Application GRANTED.

Defendant's recognizance bond must be cosigned by one financially responsible person and two persons for moral suasion. *See* Dkt. 29.

Defendant's home incarceration is hereby modified so that he can work in construction and renovation during regular business hours or during hours as approved by Pretrial Services and that the work be limited to vacant apartments or houses, that are empty of occupant belongings.

SO ORDERED.



Date: September 18, 2020

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE